

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

PHILLIP LEE; PAMELA WHITE;
PATRICIA VANDUSEN; RONALD
ALLIX; and RANDY WELCH,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

BELVOIR MEDIA GROUP, LLC,

Defendant.

Case No. 4:22-cv-12153-SDK-DRG

**DECLARATION OF
KRISTEN C. RODRIGUEZ**

I, Kristen C. Rodriguez, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Dentons US, LLP and counsel for Defendant Belvoir Media Group, LLC (“Belvoir”) in the above-referenced action.
2. I make this Declaration in support of Belvoir’s Opposition to Plaintiffs’ Motion for Leave to File Second Amended Complaint in the instant action for the purpose of transmitting certain documents to the Court.
3. Attached to this Declaration are true and correct copies of the following documents:

Exhibit A: Thomas E. Canfield’s January 25, 2023 Declaration filed in support of Belvoir’s Motion to Dismiss Plaintiffs’ First Amended Complaint.

Exhibit B: Thomas E. Canfield's March 9, 2023 Declaration filed in support of Belvoir's Reply Brief in Support of its Motion to Dismiss Plaintiffs' First Amended Complaint.

Exhibit C: Thomas E. Canfield's August 18, 2022 Declaration filed in support of Belvoir's Motion to Dismiss Plaintiffs' First Amended Complaint in *Taylor v. Belvoir Media Group, LLC*, No. 1:22-cv-00477 (W.D. Mich. May 30, 2022).

Exhibit D1: A screenshot from Facebook's Ad Library of an advertisement published by "Consumer Rights Law" that started running on November 6, 2023 and was active as of the date of the screenshot, which was taken on November 16, 2023. This advertisement linked to the website attached as Exhibit D2 through the "Learn more" button.

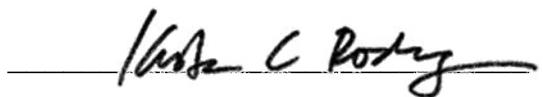
Exhibit D2: A screenshot of the website linked from the advertisement in Exhibit D1, titled "Michigan Subscriber Privacy Help," indicating it is "Attorney Advertising - Hedin Hall," available at <https://www.consumerattorneyhelp.com/belvoir-media-investigation/> (first visited November 16, 2023 and last accessed January 16, 2023).

Exhibit E: The docket sheet for *Taylor v. Belvoir Media Group, LLC*, No. 1:22-cv-00477 (W.D. Mich.).

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I declare under penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed this 18th day of January, 2024.



Kristen C. Rodriguez